



# DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY  
P.O. Box 176 Jefferson City, MO 65102-0176

Bob Holden, Governor • Stephen M. Mahfood, Director

7ES  
Site: Herculaneum  
ID# MO0006266373  
Break: 160  
Other: 8-27-01

4717

AUG 27 2001

James M. Lanzafame  
Environmental Manager  
The Doe Run Company  
881 Main Street  
Herculaneum, MO 63048

40173226



SUPERFUND RECORDS

Dear Mr. Lanzafame:

In the near future, new controls which are intended to bring ambient air levels for lead near the Doe Run Herculaneum smelter into compliance with the National Ambient Air Quality Standard will be implemented. As the area approaches compliance levels, the Air Pollution Control Program believes we should make sure that the monitoring network continues to be appropriate. To do so, we intend to conduct a review of the ambient air monitoring network, including sites operated by the State and Doe Run Herculaneum. The outcome of this review will be to recommend site locations and operating schedules. It is our intent that the network in the area of Doe Run Herculaneum meet all appropriate State and Local Air Monitoring Station (SLAMS) objectives. If it is determined that network revisions should be made, hopefully those can be completed expeditiously.

For the time being, we are requesting that Doe Run continue to operate its current network, as will the Department of Natural Resources. As you know, several of the current monitoring sites have achieved compliance with the National Ambient Air Quality Standards for the last few years, some of them by an ample margin. This is one indicator we will use to determine whether sites continue to be necessary, but not the only one, and until the review is complete, we cannot know which sites might need to continue operation.

Three of the sites operated by Doe Run do have siting criteria issues. These include the Golf Course, Bluff, and Ursuline sites. In essence, tree growth at the Golf Course and Bluff sites need minimal trimming to make the sites acceptable. Mr. Rusty Keller, Environmental Engineer for Doe Run has been informed during

James M. Lanzafame

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an on-site visit of the particulars, and we ask that this trimming be done in the next few weeks, and that you inform us of its completion.

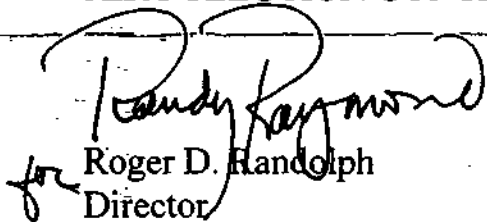
At the Ursuline site, trees in the area have become so problematic that a number of them would need to be removed to make the site acceptable. However, as with the others, until the network review is completed, we are asking that you continue to operate this site as is. Recommendations for the Ursuline site will determine whether a site in the vicinity should be operated. If so, a location nearby may have to be found.

Finally, in order that we may have up-to-date information regarding the operation of your sites, I am requesting that you forward copies of your current ambient air lead monitoring quality assurance project plan and standard operating procedures as soon as possible. We will review them to establish that they continue to meet Quality Assurance criteria as last revised by the U.S. Environmental Protection Agency.

We are confident that as we work through the process, it will benefit the area and Doe Run Herculaneum to maintain a good record of evaluating ambient air quality in the area. We thank you for your assistance. Please contact John Rustige of my staff at (573) 751-4817 if you have any questions regarding our request.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

  
for Roger D. Randolph  
Director

RDR:trb

~~Enclosure~~

c: Tony Petruska, EPA Region VII  
Mike Davis, EPA Region VII  
Dave Mosby, Hazardous Waste Program  
Doug Edwards, Environmental Services Program